

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
(ERIE)**

In re:

JOSEPH MARTIN THOMAS,
Debtor.

Case No.: 20-10334

Chapter 11

**NOTICE OF APPEARANCE, REQUEST FOR NOTICE AND SERVICE OF ALL DOCUMENTS
AND RESERVATION OF RIGHTS**

TO THE CLERK OF THE BANKRUPTCY COURT:

PLEASE TAKE NOTICE that pursuant to Federal Rule of Bankruptcy Procedure 2002(g) and 9010(b), Crystal H. Thornton-Illar and Leech Tishman Fuscaldo & Lampl, LLC hereby appear as counsel to The Kada Gallery in the above proceeding, and request that Leech Tishman Fuscaldo & Lampl, LLC be added to the official mailing matrix and service lists in the above-captioned Chapter 11 case.

PLEASE TAKE FURTHER NOTICE that all documents filed with the Court and all notices given or required to be given in this case, be given and served upon the following:

Crystal H. Thornton-Illar
Leech Tishman Fuscaldo & Lampl, LLC
525 William Penn Place, 28th Floor
Pittsburgh, PA 15219
Telephone: 412-261-1600
Cthornton-illar@leechtishman.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes without limitation, all orders, notices, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statements of financial affairs, operating reports, plans of reorganization, and disclosure statements, including all amendments to any of the foregoing, whether formal or informal, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex, facsimile, electronic mail, or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this Entry of Appearance and Request for Notices nor any subsequent appearance, pleading, claim or suit is intended or shall be deemed to waive (i) rights to have orders in non-core matters entered only after de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable in any case, controversy or adversary proceeding; (iii) right to have the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, set-offs or recoupments to which The Kada Gallery is or may be entitled under agreements or in law or in equity, all of which rights, claims, actions, defenses, set-offs, and recoupments The Kada Gallery expressly reserves.

LEECH TISHMAN FUSCALDO & LAMPL, LLC

Dated: July 30, 2020

/s/ Crystal H. Thornton-Illar
Crystal H. Thornton-Illar
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